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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**Robert A. Pastor; Scott M. Van
Horn; Regina M. Florence; and
William E. Florence III, on
behalf of themselves and all
others similarly situated,**

Plaintiffs,

v.

Bank of America, N.A.

Defendant.

Case No.: 15-cv-03831-VC

**DECLARATION OF
ATTORNEY RYAN MCBRIDE
IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR
ATTORNEYS' FEES, COSTS
AND INCENTIVE PAYMENT**

I, Ryan McBride, declare as follows:

1. I am one of the attorneys for the Plaintiffs Robert A. Pastor, Regina Florence, William Florence, and Scott Van Horn (collectively referred to as "Plaintiffs"). I am over the age of 18 and am fully competent to make this declaration. I am a member in good standing of the bars of the State of California, Arizona, Washington, and Utah.

2. If called as a witness, I would competently testify to the matters herein from personal knowledge. The declaration is based upon my personal knowledge, except where expressly noted otherwise.
3. I submit this declaration in support of the Plaintiffs' motion for fees and costs and final approval of class action settlement.
4. This action, which was originally filed on August 21, 2015, was taken on a contingency fee basis agreeing to advance all necessary expenses knowing that I would only receive a fee if there were a recovery.
5. On July 26, 2016 the parties participated in a mediation conducted by Honorable Edward A. Infante (Ret.) that culminated with the filing of the Motion for Preliminary Approval.
6. I have been preliminarily approved as Class Counsel in this matter.
7. I have incurred 50 hours in connection with this action, which time records were carefully reviewed. Specifically, I have incurred hours reviewing documents, motion practice, communicating with opposing counsel, communicating with co-counsel on related matters, preparing for hearings, and a significant amount of time participating in mediation.
8. In my fee request I have included a request for 10 hours of additional time that I will likely spend going forward in seeking final approval of, and implementing the Settlement, including assisting Class Members with claims and overseeing claims administration, and preparing and filing the motion for final approval of class action settlement.
9. As of June 2017, my firm, Kazerouni Law Group along with my co-counsel's firm, Hyde & Swigart, have incurred \$19,023.42 in litigation costs.
10. I am not seeking recovery of fees for hours incurred by paralegals working at Kazerouni Law Group on this action.
11. I believe that the Parties are fully apprised of the relative strengths and weaknesses of each other's claims and defenses and the potential risks to each

1 party of pursuing further litigation in this matter, especially following
2 mediation.

3 12. I continue to be unaware of any conflict of interest between Plaintiffs and any
4 settlement class member or between Plaintiffs and Plaintiffs' attorneys.

5 **COUNSEL'S EXPERIENCE**

6 13. I have been licensed to practice law since June 2014. I practice law full time as
7 a private consumer rights plaintiff's attorney and am now the Managing
8 Associate of the Arizona office for Kazerouni Law Group. My primary
9 responsibilities include managing the Arizona office including and handling
10 all attorney responsibilities within Arizona.

11 14. I regularly manage and supervise other associates and staff within our firm,
12 assigning projects and giving advice.

13 15. I was primarily responsible for opening our office in Phoenix, Arizona, and
14 developing this location's caseload.

15 16. Kazerouni Law Group Arizona branch's practice is almost exclusively devoted
16 to consumer rights and the litigation of Federal Fair Credit Reporting Act
17 matters.

18 17. I have undergone broad training in the area of consumer rights. The following
19 is a list of recent training conferences:

- 20 ■ Three-day National Consumer Law Center: Fair Credit Reporting Act
21 Training Conference, in Las Vegas, NV - May 2015;
- 22 ■ Four-day National Consumer Law Center Conference; San Antonio, TX –
23 November, 2015;

24 18. I have been requested to make an appearance on ABC Channel 15 news
25 regarding the recent Volkswagen scandal and class action settlement.
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1 19. Based on the foregoing and the fact that I have been practicing for over three
2 years, I believe the hourly rate of \$300.00 is a fair and reasonable hourly rate.
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4 I declare under penalty of perjury, under the laws of the United States and the
5 State of California, that the foregoing is true and correct. Executed this 12th day of
6 October 2017, at Phoenix, Arizona.

7 By: /s/ Ryan McBride

8 Ryan McBride
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